

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

KENDALL WARE,  
SYDNEY PARTIN, and  
HALEY SOMMER,

Plaintiffs,

V.

Civil Action No. 2:22-CV-212

THE UNIVERSITY OF VERMONT  
AND STATE AGRICULTURAL  
COLLEGE, THE BOARD OF  
TRUSTEES OF THE UNIVERSITY  
OF VERMONT AND STATE  
AGRICULTURAL COLLEGE,  
NICHOLAS STANTON, KATHERINE  
SPENCE, TARYN MORAN, JEFFREY  
SCHULMAN, KRISTA BALOGH,  
JOSEPH RUSSELL, and OTHER  
UNIDENTIFIED DEFENDANTS,

Defendants.

**DEFENDANTS' MOTION TO DISMISS**

## EXHIBIT LIST

<b>EXHIBIT</b>	<b>DESCRIPTION</b>
A	Sexual Harassment and Misconduct Policy effective August 26, 2016 (“2016 SHM Policy”)
B	Sexual Harassment and Misconduct Policy with May 1, 2020 update (“May 2020 SHM Policy”)
C	Discrimination, Harassment, and Sexual Misconduct – Interim Policy effective August 13, 2020 (“August 2020 Interim DHSM Policy”)
D	Discrimination, Harassment, and Sexual Misconduct Policy with interim status removed December 16, 2020 (“December 2020 DHSM Policy”)
E	Current Discrimination, Harassment, and Sexual Misconduct Policy (“Current DHSM Policy”)
F	Procedural Guidelines for Handling and Resolving Discrimination Complaints 2017-2018 (“2017-2018 Procedural Guidelines”)
G	Procedural Guidelines for Handling and Resolving Discrimination Complaints effective October 4, 2018 (“2018 Procedural Guidelines”)
H	Procedural Guidelines for Handling and Resolving Discrimination Complaints effective January 10, 2019 (“2019 Procedural Guidelines”)
I	Handling and Resolving Discrimination, Harassment, and Sexual Misconduct Complaints – Interim effective August 14, 2020 (“August 2020 Interim

	Resolution Procedure”)
J	Handling and Resolving Discrimination, Harassment, and Sexual Misconduct Complaints –with interim status removed December 15, 2020 (“December 2020 Resolution Procedure”)
K	Current Handling and Resolving Discrimination, Harassment, and Sexual Misconduct Complaints (“Current Resolution Procedure”)
L	Informal Resolution Agreement signed by Kendall Ware
M	Email from Sydney Partin to Joseph Russell